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7
 8 **UNITED STATES DISTRICT COURT**
 9
 10 **DISTRICT OF NEVADA**

11 ***

12 TAYLOR SOMMER, individually; TAYLOR
 13 SOMMER, as the Administrator of the ESTATE
 14 OF REINER SHAWN SOMMER, deceased,

15 Plaintiffs,

16 vs.

17 CITY OF LAS VEGAS, NEVADA, a political
 18 subdivision of the State of Nevada; LAS
 19 VEGAS METROPOLITAN POLICE
 20 DEPARTMENT, a political subdivision of the
 21 State of Nevada; JOE LOMARDO, individually
 22 and as a policy maker and Sheriff of LAS
 23 VEGAS METROPOLITAN POLICE
 24 DEPARTMENT; SERGEANT GERALD
 25 BAGAPORO, individually and in his official
 26 capacity; SERGEANT JEFFREY BLUM,
 27 individually and in his official capacity;
 28 OFFICER ANDREW GARCIA, individually
 and in his official capacity; OFFICER JOSEPH
 ORTEGA, individually and in his official
 capacity; DOE LAS VEGAS METROPOLITAN
 POLICE DEPARTMENT SUPERVISORS I
 through X, inclusive; ROE LAS VEGAS
 METROPOLITAN POLICE DEPARTMENT
 OFFICERS XI through XX, inclusive,

Defendants.

Case No.: 2:23-cv-01682-GMN-NJK

STIPULATION TO EXTEND TIME TO
RESPOND TO MOTION FOR SUMMARY
JUDGMENT [ECF #32] (THIRD
REQUEST)

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1 COMES NOW, Plaintiff, TAYLOR SOMMER, individually, and TAYLOR SOMMER, as
2 the Administrator of the ESTATE OF REINER SHAWN SOMMER, deceased (*collectively*,
3 “*Plaintiffs*”), and Defendants, LAS VEGAS METROPOLITAN POLICE DEPARTMENT; JOE
4 LOMBARDO; SERGEANT GERALD BAGAPORO; SERGEANT JEFFREY BLUM; OFFICER
5 ANDREW GARCIA; and OFFICER JOSEPH ORTEGA (*collectively*, “*Defendants*”) by and
6 through their undersigned counsel of record, and hereby stipulate and agree as follows:
7

- 8 1. The Defendants hereto filed a Motion for Summary Judgment on January 10, 2025 [ECF
9 #32]. Pursuant to a stipulation for a second extension granted on February 19, 2025 [ECF
10 #39], a response to said Motion is presently due on February 28, 2025.
- 11 2. Plaintiff’s counsel has had a number of other work obligations which have greatly reduced
12 the time available to respond to the subject motion, including numerous other briefs,
13 motions and oppositions. Since the time of the second extension, Plaintiff’s counsel has
14 also had several medical appointments. The Response is nearly completed but requires
15 final review and editing before filing.
- 16 3. Based upon the foregoing, Plaintiffs’ counsel has requested and shall be granted an
17 extension of time in which to respond to Defendants’ Motion for Summary Judgment until
18 March 7, 2025. Plaintiffs intend to file the Response prior to said time but desire to avoid
19 even the possibility of requiring any additional extensions.
- 20 4. The requested extension should not interfere with the parties’ ability to complete briefing
21 in advance of the settlement conference that is scheduled to take place on March 24, 2025
22 [ECF #35].

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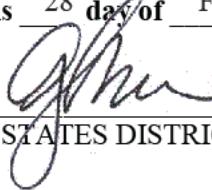
1 5. This Stipulation is made in good faith and not for purpose of delay.

2 DATED this 28th day of February, 2025.

<p>3 ROGER P. CROTEAU & ASSOCIATES, LTD.</p> <p>4</p> <p>5 <u>/s/ <i>Timothy E. Rhoda</i></u></p> <p>6 ROGER P. CROTEAU, ESQ. Nevada Bar No. 4958 TIMOTHY E. RHODA, ESQ. Nevada Bar No. 7878 2810 West Charleston Blvd., #67 Las Vegas, Nevada 89102 702-254-7775 croteaulaw@croteaulaw.com <i>Attorney for Plaintiffs</i></p>	<p>3 MARQUIS & AURBACH</p> <p>4</p> <p>5 <u>/s/ <i>Craig R. Anderson</i></u></p> <p>6 CRAIG R. ANDERSON, ESQ. Nevada Bar No. 6882 10001 Park Run Drive Las Vegas, Nevada 89145 702-382-0711 canderson@maclaw.com <i>Attorney for Defendants</i></p>
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12 **IT IS SO ORDERED:**

13 Dated this 28 day of February 2025.

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15 UNITED STATES DISTRICT JUDGE

16 **ROGER P. CROTEAU & ASSOCIATES, LTD.**
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 28th day of February, 2025, I served via the United States District Court CM/ECF electronic filing system, the foregoing **STIPULATION TO EXTEND TIME TO RESPOND TO MOTION FOR SUMMARY JUDGMENT [ECF #32]** (**THIRD REQUEST**) to the following parties:

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/s/ Timothy E. Rhoda

An employee or agent of ROGER P.
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Attorneys for Plaintiffs